

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Haley Payne,

Case No. 3:21cv1068

Plaintiff,

REPORT OF PARTIES'
PLANNING MEETING

-vs-

CSX Transportation, Inc.,

Judge Jeffrey J. Helmick

Defendant.

- l. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b), a meeting was held on August 30, 2020, and was attended by:

James H. Wettermark, Counsel for Plaintiff

James R. Carnes, Counsel for Defendant

2. The parties will exchange pre-discovery disclosures required by Rule 26(a)(1) by:

September 15, 2021

3. The parties recommend the following track:

Standard

4. This case is suitable for the following Alternative Dispute Resolution (“ADR”) mechanism:

Mediation

5. The parties do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. 636(c).

6. The parties agree that this case does involve electronic discovery.

7. Recommended Discovery Plan:

- (a) Describe the subjects on which discovery is to be sought, the nature and extent of discovery and any potential problems: Liability and damages.

- (b) Describe anticipated e-discovery issues: Any electronic discovery should be very slight. No problems are anticipated. Paper copies of electronic documents should suffice.

(c) Describe handling of expert discovery:

Plaintiff's expert disclosures due: April 29, 2022

Defendant's expert disclosures due: May 30, 2022

(d) Discovery Deadlines:

Liability: August 1, 2022

Damages: August 1, 2022

8. Recommended dispositive motion date:

August 15, 2022

9. Recommended cut-off for amending the pleadings and/or adding additional parties:

October 14, 2022

10. Recommended date for status hearing and/or final pretrial settlement conference:

October 3, 2022

11. Other matters for the attention of the Court:

None

James H. Wettermark, Attorney for Plaintiff:

s/ James H. Wettermark

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